REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-25 and 29-34 are pending, Claim 28 has been canceled, Claims 26-27 are canceled without prejudice by the present amendment, and Claims 1, 21, 25 and 29 are amended to clarify the claimed subject matter. No new matter is added.

In the outstanding Office Action, Claim 27 was objected to as being of improper dependent form, Claims 1- 7, 9-11 and 14-34 were rejected as unpatentable over <u>Kohonen et al.</u> (article entitled "Self Organization of a Massive Document Collection") in view of <u>Derthick</u> (article entitled "Interfaces for Palmtop Image Search"), Claim 8 was rejected as unpatentable over <u>Kohonen et al.</u> in view of <u>Derthick</u> and in further view of <u>Doerre et al.</u> (U.S. Patent No. 6,446,061), and Claims 12-13 were rejected as unpatentable over <u>Kohonen et al.</u> in view of <u>Derthick</u> and in further view of <u>Bruijn et al.</u> (article entitled "Patterns of Eye Gaze during Rapid Serial Visual Presentation").

Regarding the objection to Claim 27, Claim 27 is canceled. Thus, it is respectfully submitted that the objection is now moot.

Regarding the rejection of 1-25 and 29-34, Applicant respectfully submits that the rejection is overcome because, in Applicant's view, amended independent Claims 1, 21 and 29 patentably distinguish over the applied references as discussed below.

First, Claim 1 is amended to recite, *inter alia*, "a memory configured to store a set of distinct information items *related to contents of items of video material*."

Although <u>Kohonen et al.</u> suggests a memory in the system, <u>Kohonen et al.</u> does not teach or suggest that the memory stores a set of distinct information items related to contents of video materials. Instead, what the memory of <u>Kohonen et al.</u> stores are the documents (*i.e.*,

contents) themselves. Similarly, <u>Derthick</u> also fails to teach or suggest a memory storing a set of distinct information items related to contents of items of video material.

Thus, <u>Kohonen et al.</u> and <u>Derthick</u> fail to teach or suggest "a memory configured to store a set of distinct information items *related to contents of items of video material*," as recited in Claim 1.

Second, Claim 1 is amended to recite, *inter alia*, "a detector configured to detect *positions of nodes, within the array of nodes, to which the selected information items have been mapped*."

The outstanding Office Action states that the examiner wishes to state that <u>Kohonen et al.</u>'s method clearly must detect positions in order to rank them for search result (Office Action at page 25, lines 15-17). However, Claim 1 is now amended to clarify that the detector is configured to detect *positions of nodes, within the array of nodes, to which the selected information items have been mapped*. Instead, in <u>Kohonen et al.</u>, the "positions," which must be detected in order to rank the search result, are those of the matching locations in the document. <u>Kohonen et al.</u> does not disclose detecting positions of nodes, to which the selected information items have been mapped, the mapping having been performed based on mutual similarity of the information items, as recited in Claim 1.

Thus, <u>Kohonen et al.</u> fails to teach or suggest "a detector configured to detect *positions of nodes, within the array of nodes, to which the selected information items have been mapped*," as recited in Claim 1. <u>Derthick</u> also fails to teach or suggest this feature as recited in Claim 1.

Third, Claim 1 is amended to recite, *inter alia*, "a graphical user interface configured to display display points within a display area on a user display, *positions of the display points determined based on the detected positions of the nodes to which the selected information items have been mapped*."

10

Kohonen et al. describes that 30 best-matching units are marked on the display with circles the size of which indicates the goodness of the match (Kohonen et al. in Fig. 6). However, Kohonen et al. does not teach or suggest that the positions of the circles are determined based on the detected position of the nodes to which the selected information items have been mapped. Similarly, Derthick also fails to disclose that the position of the display points are determined based on the detected position of the nodes to which the selected information items have been mapped.

Thus, Kohonen et al. fails to teach or suggest "a graphical user interface configured to display display points within a display area on a user display, *positions of the display points determined based on the detected positions of the nodes to which the selected information items have been mapped*," as recited in Claim 1.

Likewise, the applied references fail to teach or suggest "[a]n information retrieval method for a video processing apparatus in which a set of distinct information items related to contents of items of video material are mapped to respective nodes in an array of nodes by mutual similarity of the information items," "detecting positions of nodes, within the array of nodes, to which the selected information items have been mapped" and "displaying display points within a display area on a user display, positions of the display points determined based on the detected positions of the nodes to which the selected information items have been mapped," as recited in Claim 21.

Likewise, the applied references fail to teach or suggest "… a memory that stores a set of distinct information items related to contents of video materials and an information retrieval system in which a set of distinct information items are mapped to respective nodes in an array of nodes by mutual similarity of the information items" and "a graphical user interface having a display area arranged to display display points, positions of the display points determined based on the detected positions of the nodes to which the selected
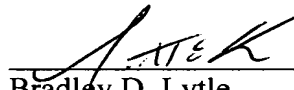
11

information items have been mapped, a display area arranged to display in a sequence in time

a plurality of representations of the selected information items," as recited in Claim 29.

Accordingly, independent Claims 1, 21 and 29 patentably distinguish over the applied

references. Therefore, Claims 1, 21, and 29 and the pending Claims 2-20, 22-25 and 30-34

dependent therefrom are believed to be allowable.

In view of the amendments and discussions presented above, Applicant respectfully

submits that the present application is in condition for allowance, and an early action

favorable to that effect is earnestly solicited.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

Bradley D. Lytle
Attorney of Record
Registration No. 40,073

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
 (OSMMN 06/04)

BDL/TY:pta
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